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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THE INDEPENDENCE PROJECT, INC., a
New Jersey Non Profit Corporation, and
RONALD MOORE, Individually,

Plaintiffs,

vs.

H.G. CLARKE, L.L.C., a New Jersey Limited
Liability Company,

Defendant/Third-Party Plaintiff,

vs.

NA NA LIN, QING FENG BUFFET OF LIN
INC, GULJAR SINGH, BIG BLUES SUB
SHOP, JOHN DOE 1-10, and ABC CORP. 1-
10,

Third-Party Defendants.

Civil Action No. 2:17-cv-06221-ES-JAD

**STIPULATION OF DISMISSAL
AND
CONSENT ORDER**

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IT IS HEREBY STIPULATED AND AGREED that, in accordance with Federal Rule
of Civil Procedure 41(a)(1)(A)(ii), plaintiffs, The Independence Project, Inc. and Ronald Moore,

hereby dismiss with prejudice the above-captioned action against defendant, H.G. Clarke, L.L.C.

IT IS FURTHER HEREBY STIPULATED AND AGREED that, in accordance with Federal Rule of Civil Procedure 41(c)(1), third-party plaintiff, H.G. Clarke, L.L.C., hereby dismisses without prejudice the above-captioned action against third-party defendants, Na Na Lin, Qing Feng Buffet of Lin Inc, Guljar Singh, and Big Blues Sub Shop.

IT IS FURTHER HEREBY STIPULATED AND AGREED that, in accordance with Federal Rule of Civil Procedure 41(a)(2), this Court will retain ancillary jurisdiction to enforce the terms of the Settlement Agreement and General Release entered into among The Independence Project, Inc., Ronald Moore, and H.G. Clarke, L.L.C. Such ancillary jurisdiction will run until December 31, 2020.

LAW OFFICES OF ALAN R.
ACKERMAN
Attorneys for plaintiffs

By:

Date:

4-9-2018

**POST, POLAK, GOODSELL
& STRAUCHLER, P.A.**
Attorneys for defendant

By: /s/ Frederick B. Polak
Frederick B. Polak

Date: 4-9-2018

IT IS SO ORDERED:

Hon. Esther Salas, U.S.D.J.

Date:

Hon. Esther Salas, U.S.D.J.